

AUG 26 1981



ADVANCED CIRCUITRY

P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0751

August 24, 1981

AUG 23 1981

SOLID WASTE
MANAGEMENT PROGRAM

Mr. Ed Lightfoot
Deputy Director
Air and Land Branch
Missouri Department of Natural Resources
P. O. Box 1368
1915 Southridge Drive
Jefferson City, Missouri 66102

RE: Letter of July 31, 1981, directed to Mr. W. C. Guyette,
President, Litton Advanced Circuitry Division

Dear Mr. Lightfoot:

On August 17, 1981, we met with local DNR officials, Ed Sears and Burt McCullough, to discuss the results of our RCRA inspection and your other requests. Our response to your letter is as follows:

Previous analysis of monitoring wells of sanitary lagoon and percolation lagoon: ACD files for the above were made available to Mr. Ed Sears and Mr. Burt McCullough for examination. After examination, Mr. McCullough was given copies of the files he requested.

Labeling of waste containers: The labeling of waste containers has been in compliance with D.O.T. regulations 49 CFR Para. 172. It is our opinion that barrels addressed in the unsatisfactory remarks were rinsed, empty, and awaiting return for deposit. All barrels addressed in the receiving area were either incoming material, or empty barrels, thus requiring no RCRA labeling. Please be advised that chemicals that could possibly constitute a spill problem will be moved into containment areas or inside the warehouse.

Monitoring Plan: After discussion of the monitoring plan with Mr. Ed Sears and Mr. Burt McCullough, we propose to monitor for Trichlorethylene. The plan includes a monthly sampling for three months, starting September 1, 1981, then quarterly thereafter, if a pattern has been defined. The samples will be of a grab type taken where indicated below. Samples will immediately be analyzed by our lab, or preserved on ice and shipped to Stewart Labs. The process for taking the samples is described below:



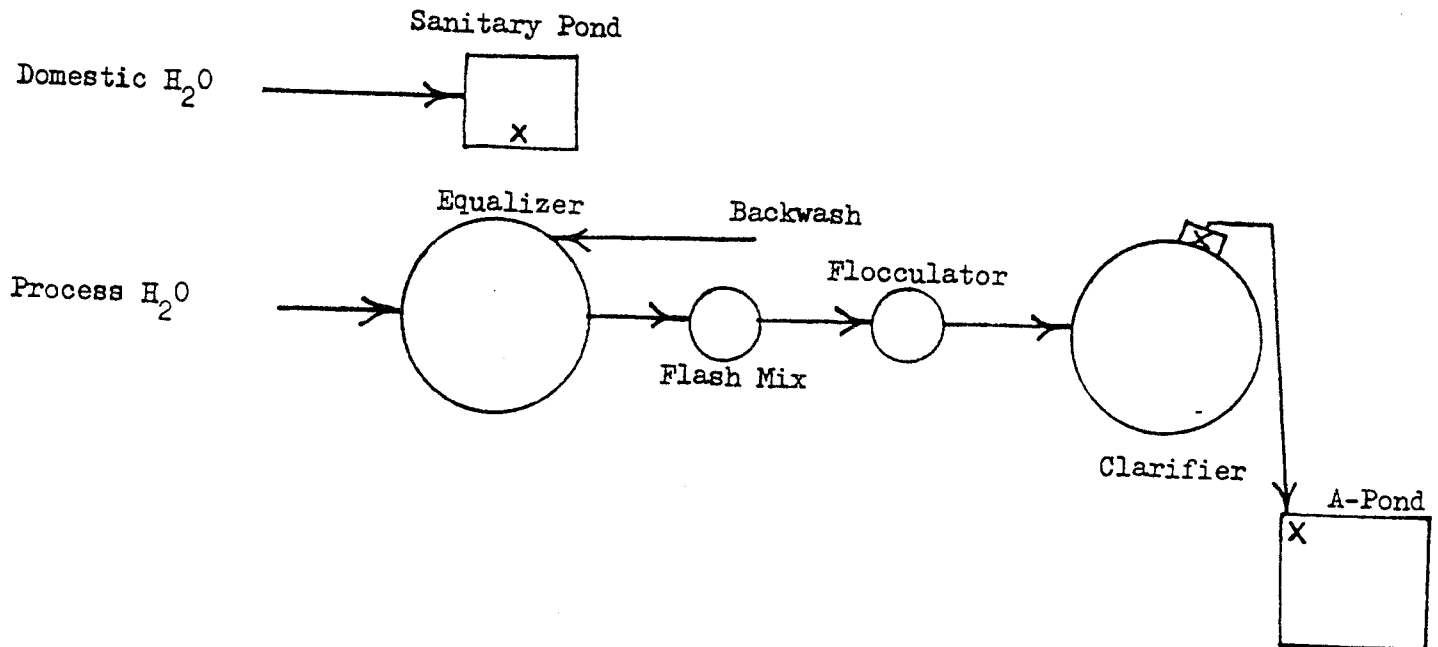
R00337267
RCRA RECORDS CENTER

"ENFORCEMENT CONFIDENTIAL"
Determined Not Confidential
7/25/83

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Effluent Flow and Grab Sample Points

x = sample point



Litton has purchased a new Gas Chromatograph to test for Volatile Organics. We expect to have it operational October 1, 1981. Until such time that it is operational, samples will be sent to Stewart Laboratories, Knoxville, Tennessee.

Treatment tank freeboard: The two foot freeboard required was achieved June 17, 1981, by an operational change which lowered the level of the treatment tank.

Percolation lagoon freeboard: The two foot freeboard required for the percolation lagoon cannot be practically met by September 18, 1981. As of August 24, 1981 the freeboard is 18-3/4". We request an extension to have a 24" minimum by January 30, 1982.

Security for the percolation lagoon: Security at the percolation lagoon will be achieved by installing a 3-strand barbed fence with a locked gate, around the base of the lagoon. Signs stating "Danger-Unauthorized Personnel Keep Out" will be posted at the gate and on each side of the fence as required. This will be completed by September 1, 1981.

Contingency Plan: The contingency plan will be distributed to local Fire, Sheriff, Police, City Sanitary Services, and DNR offices by September 1, 1981.

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Closure Plan: New changes in the laws have required additional detail in the closure plans. The new plan is as follows:

On or about January, 1982, the city sewer system will be available for hook-up and Litton will begin use for effluent discharge. At this time, Litton will discontinue discharging effluent waters to A-pond and it will be allowed to percolate to zero level leaving a sludge on the base. At the present percolation rate, allowing for rain, and assuming a drop in the head pressure with the level, percolation will continue for approximately 300 days. This would put the start of disposal at about November 1, 1982.

Based on calculations approximately 1600 cu. yds. of sludge will have accumulated and will be removed to a hazardous waste site. This material will be removed with heavy equipment into 15 cu. yd. containers and permitted for shipment to Bob's Home Service in Wright City or National Industrial Environmental Services in Wichita, Kansas.

Decontamination of equipment will include washdown within the pond itself and dewatering of waste through our filter press. This material will also be shipped via our normal process to the landfill.

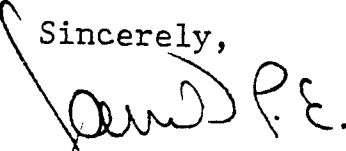
Actual closure will start in November and take approximately two months of excavation and loading time. Final closure will consist of grading over and seeding of the site.

In lieu of the above, ACD is investigating methods for rendering the sludge non-hazardous. In the event ACD is successful, we would submit a modified closure plan.

The Financial Assurance for closure is being addressed and will be completed by October 13, 1981.

If you have any questions or comments, do not hesitate to contact us.

Sincerely,

 P.E.
James K. Dow, P.E.
Facilities Manager

cc: John Nixon
Administrator, DNR
Springfield Office

Generator File

TELEPHONE OR CONFERENCE RECORD

File Litton Advanced Circuitry - SpringfieldDate September 15, 1981

TELEPHONE

CONFERENCE

Incoming ()

Field ()

Outgoing (X)

Office ()

SUBJECT Financial Requirements for Closure of Percolation Lagoon

PERSONS INVOLVED

Name

Representing

Gerald P. LuceyLegal Counsel, Litton IndustriesPaul MeiburgerMissouri Department of Natural Resources

SUMMARY OF CONVERSATION Mr. Lucey briefly discussed the content of his September 14, 1981 letter. I told him that Missouri Department of Natural Resources will not require anything over Federal EPA regulations, since we adopted interum status by reference, 40 CFR, Part 265. Look for the Federal Register with standards for financial requirements soon to be released, and that is what is required by October 13, 1981. If EPA postpones the October 13, 1981 date, so will the state. There is a problem with Litton suppling their own financial requirements by means of their net worth. Litton Systems, Inc. is the legal entity in Missouri. Litton Systems is a subsidiary of Litton Industries and Litton Systems alone does not have sufficient net worth for there own financial requirements.

FINAL RESULTS

Paul Meiburger
Paul Meiburger

Signature

Other Contact

Gerald Lucy
Lithon Industries
4825 Scott, Suite 410
Schiller Park Illinois 60176
(312) 671-2930

X

Mrs. Ott Elk
Marshall McClellan Insurance Co
Los Angeles, Calif.

DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality

TELEPHONE OR CONFERENCE RECORD

File Litton Industries - Springfield

Date September 23, 1981

TELEPHONE

CONFERENCE

Incoming ()

Field ()

Outgoing (X)

Office ()

SUBJECT Financial Requirements for Percolation Lagoon

PERSONS INVOLVED

Name

Representing

W. C. Guyette

President, Litton Advanced Circuitry

Paul Meiburger

Missouri Department of Natural Resources

SUMMARY OF CONVERSATION After calling EPA in Washington, D.C., I found out that sometime next week a Federal Register will be coming out that will postpone the deadline for Financial Requirements from October 13, 1981 to April 13, 1982. This will also postpone the State Requirements mentioned in previous letters between Missouri Department of Natural Resources and Litton: i.e., July 31, 1981, Guyette from Lightfoot; and September 10, 1981, James Dow from Lightfoot.

ACTION TAKEN

FINAL RESULTS

cc: Ed Lightfoot

Paul Meiburger
Paul Meiburger
Signature